BEFORE THE RI POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 AUG 7

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE

MOTION FOR LATE ACCEPTANCE OF

WITNESS LION'S RESPONSES TO INTERROGATORIES OF

THE OFFICE OF THE CONSUMER ADVOCATE

(OCA/USPS-T24-10-19)

The United States Postal Service hereby moves for late acceptance of witness Lion's responses to interrogatories OCA/USPS-T24—10–19. Both witness and counsel believed -- incorrectly, as we now know -- that these interrogatory responses were due on August 8, when they were in fact due on August 6. Accordingly, their finalization was mutually scheduled for today, August 7 (the witness was out of town on August 6). Counsel contacted the OCA, described these circumstances, and agreed to fax the answers immediately upon their

¹A second set of interrogatories, OCA/USPS-T24-20-25, was also scheduled for finalization on August 7. That set is, in fact, due on August 8, but witness Lion's responses will be filed contemporaneously with the responses to OCA/USPS-T24-10-19.

finalization. Accordingly, the Postal Service believes no participant will be prejudiced by the partial-day delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3083; Fax –5402 August 7, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Kenneth N. Hollies

Kenniel & Hollie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 August 7, 1997